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ATTORNEYS AT LAW

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July 11, 2007



Charles L.A. Terreni Chief Clerk and Administrator Public Service Commission of South Carolina P.O. Drawer 11649 Columbia, SC 29211

RE: Office of the Regulatory Staff vs. Quail Pointe Apartments

Docket No.: 2007-228-G Our File No.: 07-342

Dear Mr. Terreni:

Enclosed please find the original and one copy of the **Answer** for filing in this matter. Please return the clocked copy to me in the enclosed envelope.

With kindest regards, I am

Sincerely,

PARSONS, OUVERSON, STARK, GUEST & NEILL, PA

Stephan C. Ouverson, Esquire

SCO/ccd Enclosures

cc: Public Service Commission of SC, Docketing Department Mr. Jeffrey M. Nelson, Office of Regulatory Staff

BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2007-228-G

	DOCKET NO. 2007-2		S. C. PUSCO SERVICE COM F. O LE 1 V E	SSIUN E
N RE:	Office of Regulatory Staff,) Complainant/Petitioner)			
	v.) Quail Pointe Apartments,) Defendant/Respondent)	Al	NSWER	

The Defendant/Respondent, Quail Pointe Apartments (hereinafter "Quail Pointe") would answer the Petition for and Rule to Show Cause of the Complainant/Petitioner as follows:

- 1. Quail Pointe admits the allegations contained in paragraphs 1 and 2 of the Petition.
- 2. Quail Pointe is without sufficient information or knowledge to either admit or deny the allegations contained in paragraphs 3 and 4 of the Petition and therefore would deny the same and demand strict proof thereof.
- 3. Quail Pointe would deny the allegations contained in paragraphs 5 and 6 of the Petition and would demand strict proof thereof. Further, Quail Pointe would assert that they obtained this apartment complex in April of 2005 and that they inherited a system that was already in place. A system that Quail Pointe uses is to hire an outside company to determine the charge for natural gas based upon the square footage of the unit. Quail Pointe pays the costs of this outside service and Quail Pointe pays the provider of the natural gas on a monthly basis and allows its tenants to pay their monthly charge over time.
- 4. Quail Pointe admits the allegations contained in paragraph 7 of the Petition.
- 5. Quail Pointe denies the allegations contained in paragraph 8 of the Petition, and demands strict proof thereof.
 - 6. Quail Pointe admits the allegations in paragraphs 9 and 10 of the

Petition.

- 7. Quail Pointe denies the allegations contained in paragraphs 11 and 12 of the Petition, and demands strict proof thereof.
- 8. Quail Pointe would further show unto this Commission that in May of 2007 Quail Pointe sold its interest in the property in question.

PARSONS, OUVERSON, STARK, GUEST & NEILL, PA

Stephan C. Quverson, Esquire 11883 Plaza Drive P.O. Box 2850 Murrells Inlet, SC 29576 (843) 357-8888

ATTORNEY FOR THE DEFENDANT/RESPONDENT QUAIL POINTE APARTMENTS

July 11, 2007 Murrells Inlet, South Carolina

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BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA DOCKET NO. 2007-228-G

IN RE:	Office of Regulatory Staff, Complainant/Petitioner)
	v. Quail Pointe Apartments, Defendant/Respondent)) CERTIFICATE OF SERVICE))

I, Stephan C. Ouverson, do hereby certify that I have on the date indicated below, served the Answer to the Petition on following named individuals:

Public Service Commission of South Carolina Attn: Docketing Department P.O. Drawer 11649 Columbia, SC 29211

Mr. Jeffrey M. Nelson, Esquire Office of the Regulatory Staff Complainant/Petitioner P.O. Box 11263 Columbia, SC 29211

Charles L.A. Terreni
Chief Clerk and Administrator
Public Service Commission of South Carolina
P.O. Drawer 11649
Columbia, SC 29211

PARSONS, OUVERSON, STARK, GUEST & NEILL, PA

Stephan C. Ouverson, Esquire 11883 Plaza Drive P.O. Box 2850 Murrells Inlet, SC 29576 (843) 357-8888

ATTORNEY FOR THE DEFENDANT/RESPONDENT QUAIL POINTE APARTMENTS

July 11, 2007 Murrells Inlet, South Carolina

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